

COOLEY LLP
BOBBY GHAJAR (198719)
(bghajar@cooley.com)
COLETTE GHAZARIAN (322235)
(cghazarrian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400

KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)

MARK WEINSTEIN (193043)
(mweinstein@cooley.com)

JUDD LAUTER (290945)
(jlauter@cooley.com)

ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)

3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5000

CLEARY GOTTLIEB STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
(adunning@cgsh.com)

1841 Page Mill Road, Suite 250
Palo Alto, CA 94304
Telephone: (650) 815-4131

PAUL, WEISS, RIFKIND, WHARTON & GARRISON
KANNON K. SHANMUGAM (*pro hac vice*)
(kshanmugam@paulweiss.com)
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY *et al.*,
Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation,

Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DEFENDANT META PLATFORMS, INC.’S
MOTION FOR LEAVE TO FILE A RESPONSE
TO PLAINTIFFS’ OBJECTIONS TO META’S
REPLY EVIDENCE (DKT. 552)**

1 **I. STATEMENT OF RELIEF SOUGHT**

2 Pursuant to Civil Local Rules 7-3(d) and 7-11, and for the reasons set forth herein and in
3 the accompanying Declaration of Judd Lauter (“Lauter Decl.”), Defendant Meta Platforms, Inc.
4 (“Meta”) respectfully requests leave to file a response to Plaintiffs’ Objections to Meta’s Reply
5 Evidence, dated April 24, 2025. Dkt. 552 (the “Objections”). Meta’s proposed response is attached
6 as **Exhibit A** to the Lauter Declaration.

7 **II. COMPLIANCE WITH CIVIL LOCAL RULE 7-11(a)**

8 Meta conferred with Plaintiffs’ counsel as required by Civil Local Rule 7-11(a), and
9 Plaintiffs have represented that they do not stipulate to this motion. Lauter Decl. ¶ 3.

10 **III. ARGUMENT**

11 Plaintiffs seek to strike four declarations submitted by Meta in support of its Reply in
12 Support of Summary Judgment or, in the alternative, reopen discovery to permit depositions of the
13 declarants. Plaintiffs also improperly use the Objections to respond to Meta’s criticisms of the
14 Butterick Declaration (Dkt. 519). Meta seeks leave of Court to file a short response to the
15 Objections because they misstate the record and misapply applicable law.

16 As a matter of fairness, and given the extent to which Plaintiffs seek to materially change
17 the record by way of their Objections, Meta should be allowed the opportunity to briefly respond.

18 **IV. CONCLUSION**

19 For the reasons set forth above, Meta respectfully requests leave to file the proposed
20 response attached as Exhibit A to the Lauter Declaration.

21

22

23

24

25

26

27

28

1 Dated: April 29, 2025

COOLEY LLP

2 By: /s/ Judd Lauter
3 Judd Lauter

4 COOLEY LLP
5 BOBBY GHAJAR (198719)
(bghajar@cooley.com)
6 TERESA MICHAUD (296329)
(tmichaud@cooley.com)
7 COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
8 Santa Monica, CA 90401
Telephone: (310) 883-6400

9
10 COOLEY LLP
11 MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
12 KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
13 MATTHEW BRIGHAM (191428)
(mbrigham@cooley.com)
14 JUDD LAUTER (290945)
(jlauter@cooley.com)
15 ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
16 JUAN PABLO GONZÁLEZ (334470)
(jgonzalez@cooley.com)
17 3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5000

18 COOLEY LLP
19 PHILLIP MORTON (*pro hac vice*)
(pmorton@cooley.com)
20 COLE A. POPPELL (*pro hac vice*)
(cpoppell@cooley.com)
21 1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
22 Telephone: (202) 842-7800

23

24

25

26

27

28